

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	
	)	Chapter 11
TEAM SYSTEMS INTERNATIONAL, LLC, <sup>1</sup>	)	
	)	Case No. 22-10066 (CTG)
Debtor.	)	
	)	

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR  
VIDEO HEARING ON MARCH 16, 2022, AT 10:00 (ET)**

**THIS HEARING WILL BE HELD VIA ZOOM ONLY.**

**ALL PARTIES WISHING TO APPEAR MUST REGISTER VIA THE REGISTRATION LINK  
BELOW:**

<https://tinyurl.com/3vknwmn8>

**AFTER PARTIES REGISTER, THEY WILL RECEIVE AN EMAIL GIVING THEM THE LOG-IN  
INFORMATION FOR THE SCHEDULED HEARING.**

**I. MATTERS GOING FORWARD**

1. GPDEV, LLC, Simons Exploration, Inc.'s Motion to Dismiss Case [Docket No. [41](#), filed January 27, 2022].

Related Documents:

- A. Scheduling Order [D.I. [21](#), entered January 24, 2022].
- B. Witness List and Exhibit List of Bering Straits Logistics Services, LLC and Bering Straits Native Corporation for hearing [D.I. [64](#), filed February 7, 2022].
- C. Debtor's Combined Witness and Exhibit List for hearing [D.I. [72](#), filed February 7, 2022].
- D. Combined Witness and Exhibit List of United States of America for hearing [D.I. [73](#), filed February 7, 2022].
- E. Witness List and Exhibit List for Hearing of GPDEV, LLC and Simons Exploration, Inc for hearing [D.I. [74](#), filed February 7, 2022].

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<sup>1</sup> The Debtor in this chapter 11 case has a last four digit federal tax ID of 8411. The location of the Debtor's service address in this chapter 11 case is 16192 Coastal Highway Lewes, Delaware 19958.

- F. Order to Show Cause Why This Chapter 11 Case Should Not Be Dismissed Or Converted [D.I.[99](#) , filed February 28, 2022].
- G. Exhibit List and Witness List for Hearing GPDEV, LLC and Simons Exploration, Inc. [D.I.[109](#) , filed March 4, 2022].
- H. Amended Exhibit list and Witness List for hearing of GPDEV, LLC and Simons Exploration, Inc. [D.I.[110](#) , filed March 4, 2022].
- I. Amended Exhibit list and Witness List for hearing of GPDEV, LLC and Simons Exploration, Inc.[D.I. [112](#), filed March 7, 2022].
- J. Exhibit and Witness List Filed by United States of America [D.I. [113](#), filed March 7, 2022].
- K. Combined Witness and Exhibit List of The United States Trustee for the Hearing Scheduled for March 9, 2022, at 9:00 AM [D.I. [114](#), Filed March 7, 2022].
- L. Notice of Intent of Intent to Call Witnesses for Hearing on March 9, 2022 at 9:00 am (ET) [[D.I. 122](#), filed March 8, 2022].
- M. Notice of Service of Subpoena [[D.I. 124](#), filed March 8, 2022].
- N. Supplemental Combined Witness and Exhibit List of The United States Trustee for the Hearing Scheduled for March 9, 2022 at 9:00 am [[D.I. 125](#), filed March 9, 2022].
- O. Expert Report of Ryan J. Orner [[D.I. 126](#), filed March 9, 2022].
- P. Declaration of George Peterson and Jordan Simons in Support of Creditors' Motion to Dismiss this Case for Bad Faith (D.I. 41) and Motion for Rule 37 Sanctions (D.I. 37) [[D.I. 127](#), filed March 9, 2022].
- Q. Declaration of Ryan Orner in Support of Creditors' Motion to Dismiss this Case for Bad Faith (D.I. 41) and Motion for Rule 37 Sanctions (D.I. 37) [[D.I. 128](#), filed March 9, 2022].
- R. Certification of Counsel Regarding Creditors' Motion to Dismiss [D.I. 41] and Creditors' Motion for Rule 37 Sanctions [D.I. 87] [[D.I. 130](#), filed March 11, 2022].
- S. Order Regarding Debtor's Motion for Leave to File Late Objections to (I) GPDEV, LLC and Simons Exploration, Inc.'s Motion for Entry of an Order Dismissing this Chapter 11 Case With Prejudice and (II) GPDEV, LLC and Simons Exploration, Inc.'s Motion for Rule 37 Sanctions Against Debtor [[D.I. 133](#), entered March 11, 2022].

Objection / Response Deadline: February 8, 2022 at 5:00 p.m., extended to March 2, 2022 at 5:00 pm (ET) for Debtor [[D.I. 99](#)].

Objections / Responses Received:

- A. Response of Bering Straits Logistics Services, LLC to Motion to Dismiss [[D.I. 65](#), filed February 7, 2022].
- B. Declaration of Krystal Nelson [Docket No. [66](#), filed February 7, 2022].
- C. Reply of the United States Trustee to the Motion of GPDEV, LLC and Simons Exploration, Inc. for Entry of an Order Dismissing This Chapter 11 Case With Prejudice, the Order To Show Cause Why This Chapter 11 Case Should Not Be Dismissed or Converted and The United States Trustees Cross-Motion For Dismissal of the Chapter 11 Case, or in the Alternative for Conversion of the Chapter 11 Case to a Case Under Chapter 7 [[D.I. 102](#), filed March 1, 2022].
- D. Bering Straits Logistics Services, LLC's Response to Order to Show Cause [[D.I. 103](#), filed March 2, 2022].
- E. GPDEV, LLC and Simons Exploration's Response to Order to Show Cause Why This Chapter 11 Case Should Not Be Dismissed Or Converted [[D.I. 105](#), filed March 2, 2022].
- F. Debtor's Opposition to (I) GPDEV, LLC and Simon Exploration, Inc.'s Motion for Entry of an Order Dismissing This Chapter 11 Case With Prejudice and (II) Bering Straits Logistics Services, LLC's Response Thereto [[D.I. 119](#), filed March 8, 2022].
- G. Declaration of Steven Acosta in Support of Debtor's Opposition to (I) GPDEV, LLC and Simon Exploration, Inc.'s Motion for Entry of an Order Dismissing This Chapter 11 Case With Prejudice and (II) Bering Straits Logistics Services, LLC's Response Thereto [[D.I. 120](#), filed March 8, 2022].

Status: Oral argument on this matter is going forward.

- 2. Creditors' Motion for Rule 37 Sanctions Against Debtor [[D.I. 87](#), filed February 16, 2022].

Related Documents:

- A. Certificate of Service Regarding Creditors' Motion for Rule 37 Sanctions [[D.I. 90](#), filed February 18, 2022].
- B. Combined Witness and Exhibit List of United States of America for Hearing [[D.I. 73](#), filed February 7, 2022].

- C. Witness List and Exhibit List for Hearing of GPDEV, LLC and Simons Exploration, Inc for Hearing [D.I. [74](#), filed February 7, 2022].
- D. Order to Show Cause Why This Chapter 11 Case Should Not Be Dismissed Or Converted [D.I.[99](#) , filed February 28, 2022].
- E. Exhibit List and Witness List for Hearing GPDEV, LLC and Simons Exploration, Inc. [D.I.[109](#) , filed March 4, 2022].
- F. Amended Exhibit list and Witness List for hearing of GPDEV, LLC and Simons Exploration, Inc. [D.I.[110](#) , filed March 4, 2022].
- G. Amended Exhibit list and Witness List for hearing of GPDEV, LLC and Simons Exploration, Inc.[D.I. [112](#), filed March 7, 2022].
- H. Exhibit and Witness List Filed by United States of America [D.I. [113](#), filed March 7, 2022].
- I. Combined Witness and Exhibit List of The United States Trustee for the Hearing Scheduled for March 9, 2022, at 9:00 AM [D.I. [114](#), Filed March 7, 2022].
- J. Notice of Intent of Intent to Call Witnesses for Hearing on March 9, 2022 at 9:00 am (ET) [[D.I. 122](#), filed March 8, 2022].
- K. Notice of Service of Subpoena [[D.I. 124](#), filed March 8, 2022].
- L. Supplemental Combined Witness and Exhibit List of The United States Trustee for the Hearing Scheduled for March 9, 2022 at 9:00 am [[D.I. 125](#), filed March 9, 2022].
- M. Expert Report of Ryan J. Orner [[D.I. 126](#), filed March 9, 2022].
- N. Declaration of George Peterson and Jordan Simons in Support of Creditors' Motion to Dismiss this Case for Bad Faith (D.I. 41) and Motion for Rule 37 Sanctions (D.I. 37) [[D.I. 127](#), filed March 9, 2022].
- O. Declaration of Ryan Orner in Support of Creditors' Motion to Dismiss this Case for Bad Faith (D.I. 41) and Motion for Rule 37 Sanctions (D.I. 37) [[D.I. 128](#), filed March 9, 2022].
- P. Certification of Counsel Regarding Creditors' Motion to Dismiss [D.I. 41] and Creditors' Motion for Rule 37 Sanctions [D.I. 87] [[D.I. 130](#), filed March 11, 2022].
- Q. Order Regarding Debtor's Motion for Leave to File Late Objections to (I) GPDEV, LLC and Simons Exploration, Inc.'s Motion for Entry of an Order Dismissing this Chapter 11 Case With Prejudice and (II) GPDEV, LLC and

Simons Exploration, Inc.'s Motion for Rule 37 Sanctions Against Debtor [[D.I. 133](#)], entered March 11, 2022].

Objection / Response Deadline: February 22, 2022 at 5:00 p.m, extended to February 25, 2022 at 5:00 pm for Debtor [[D.I. 92](#)]. Further extended to March 2, 2022 at 5:00 pm (ET) for Debtor [[D.I. 99](#)].

Objections / Responses Received:

- A. Response of Bering Straits Logistics Services, LLC to Creditors' Motion for Rule 37 Sanctions Against Debtor [[D.I. 98](#)], filed February 25, 2022].
- B. Opposition of Debtor Team Systems International, LLC to GPDEV, LLC and Simons Exploration, Inc.'s Motion for Rule 37 Sanctions [[D.I. 118](#)], Filed March 8, 2022].

Status: Oral argument on this matter is going forward.

Dated: March 14, 2022

**GELLERT SCALI BUSENKELL & BROWN, LLC**

/s/ Ronald S. Gellert

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*Proposed Counsel to Debtor and Debtor-in-Possession*